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May 24, 2013

PETER TANNENWALD JAMES U. TROUP

Ms. Marlene Dortch, Secretary Federal Communication Commission 445 12th Street SW Washington, DC 20554

> WT DOCKET NO. 13-54 Re: AT&T-ATNI Transaction

Dear Ms. Dortch:

This letter supplements the previous filings in this case by Buffalo-Lake Erie Wireless Systems, Co. LLC ("Blue Wireless"). Pursuant to discussions with the Dept. of Justice, we surveyed the consumer market for full-featured wireless products in the OH-3 market. The results of our survey are attached.

The attachment is a cost comparison of the rate plans offered by the mobile carriers in the market. ALLTEL's rates are very competitive against the major carriers. In particular, it can be seen that if ALLTEL customers are forced to migrate to either AT&T or Verizon – the only other carriers with market-wide 3G service -- they will incur significantly higher costs. For example, ALLTEL's rate for a single line is 32% lower than AT&T's, and its rate for a two-line plan is 7% lower. Also attached is a recent ALLTEL advertisement which underscores the competitive benefits of ALLTEL's service over its national competitors. Here is a link to the ALLTEL ad. https://howie.alltelwireless.com/resources/sites/CUSTOMER/content/live/NEWS/1000/NEWS1 299/en US/VZW%20Sharing%20Plans Sell%20Against.pdf

Fletcher, Heald & Hildreth

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Given these figures, there can be no doubt that the loss of ALLTEL as a competitor in OH-3 would have a significant adverse effect on consumer choice. While we only surveyed OH-3 due to its dire lack of viable competitors, the Commission might wish to sample other markets as well to determine whether the proposed transaction would have broader anti-consumer impacts over the entire gamut of the markets involved.

Yours truly,

Donald J. Evans

Counsel to Buffalo-Lake Erie Wireless Systems Co., LLC

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